



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 11, 2023

By ECF

Honorable Peggy Kuo  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Scott, et al. v. United States*, 19-cv-1075 (ERK) (PK)

Dear Judge Kuo:

This Office represents defendant United States of America in the above-referenced matter. On June 9, 2023, the parties filed a letter advising the Court that they had reached a tentative agreement regarding a proposed settlement framework governing the resolution of this action, and requested until June 23, 2023 in which to file a motion to stay this matter while the proposed settlement is effectuated. Dkt. No. 209. The Court granted the request. *See* Order dated June 13, 2023. The parties then determined that they required additional time to address various outstanding issues regarding the stay motion, and therefore, requested extensions of time until June 30 and then July 11. Dkt. Nos. 210-11. The Court granted the parties' requests. *See* Order dated July 3, 2023. We now write on behalf of all parties to respectfully request a ten-day extension of time, until July 21, 2023, in which to file the parties' anticipated joint motion to stay.

The reason for the requested extension of time is that, though the parties continue to work together diligently, they require additional time to reach agreement on a small number of issues concerning the settlement process which are addressed in the stay motion. The parties expect that this extension will allow them the time needed to resolve these issues and present the stay motion for Court approval.

Accordingly, the parties respectfully request that the Court extend their time in which to file the motion to stay until July 21, 2023.

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We thank the Court for its consideration of this matter.

Respectfully submitted,

BREON PEACE  
United States Attorney

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cc: All counsel of record (by ECF)